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By Recall Management Division at 6:04 am, Apr 03, 2014

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14C-003  
(8 pages)

April 2, 2014

**BY ELECTRONIC MAIL AND FEDERAL EXPRESS**

Ms. Nancy Lewis  
Associate Administrator for Enforcement  
National Highway Traffic Safety Administration ("NHTSA")  
1200 New Jersey Avenue, S.E.  
Washington, D.C. 20590

**Re: Buckle Part 573 Report**

Dear Ms. Lewis:

In compliance with Part 573 of NHTSA's regulations, Evenflo Company, Inc. ("Evenflo"), informs you of its decision to undertake a voluntary safety recall of select convertible and harnessed booster seats utilizing the AmSafe QT/QT3 harness crotch buckle. The information required by Part 573 is attached.

Please contact me if you have any questions.

Best Regards,



Amy E. Neff

Enclosures

cc: Erika Z. Jones, Esq., Mayer Brown LLP (via e-mail)  
Jennifer Timian (via e-mail)  
Scott Yon (via e-mail)

**1. Manufacturer's name/address:**

The manufacturer of the convertible and harnessed booster car seats impacted by this report (the "Subject Car Seats") is:

Evenflo Company, Inc.  
1801 Commerce Drive  
Piqua, Ohio 45356.

The manufacturer of the QT/QT3 harness crotch buckle (the "Subject Buckle"), the car seat component of the Subject Car Seats necessitating this report is:

AmSafe Commercial Products, Inc.  
22937 Gallatin Way  
Elkhart, IN 46514.

**2. Equipment involved in this notification:**

A list of the Subject Car Seats utilizing the Subject Buckle appears below, including model names, model number prefixes and affected dates of manufacture:<sup>1</sup>

Model Names	Model Number Prefix	Affected Dates of Manufacture
Momentum 65, Momentum 65 LX and Momentum 65 DLX	385	3/4/2013 through 8/26/2013
Chase, Chase LX and Chase Select	306	6/12/2012 through 10/3/2013
Chase LX and Chase DLX	329	8/23/2011 through 3/3/2014
Maestro and Maestro Performance	310	8/22/2011 through 10/17/2013
Symphony 65, Symphony LX and Symphony DLX	345	10/2/2012 through 8/26/2013
Symphony 65, Symphony 65 E3, Symphony DLX and Snugli All-in-One	346	10/2/2012 through 8/26/2013
Titan 65 and SureRide DLX	371	6/20/2012 through 10/17/2013
Secure Kid LX, Secure Kid DLX, Secure Kid 100, Secure Kid 300, Secure Kid 400 and Snugli Booster	308	12/13/2011 through 3/3/2014

<sup>1</sup> The Subject Buckle is the focus of an open NHTSA preliminary investigation of Evenflo, PE14-003, dated February 5, 2014. There is an additional car seat model that falls within the scope of that investigation that is not included in this report—the Embrace 35—a rear-facing infant child restraint. Infant child restraints experience much different use conditions and are typically in service for a shorter time period than the convertible and harnessed booster car seats that are the subject of this report. Evenflo's rear-facing infant child restraint is designed to be removed from the vehicle via release of the restraint from its vehicle base with the child remaining in his or her harness and contained within the child restraint. Accordingly, the crotch buckle is not unfastened when exiting the vehicle, in either emergency situations or everyday use. In its response to the information requests associated with PE14-003, Evenflo will be providing more information and supporting data to NHTSA regarding the stark contrast in use conditions (and complaint rates) between its rear-facing infant child restraint model and those car seat models that are the subject of this Part 573 report.



In the chart above, the start date for the range of affected dates of manufacture is the first production date utilizing the Subject Buckle on a particular car seat model. The end date for the range of affected dates of manufacture is the last date of production utilizing the Subject Buckle on a particular car seat model. A different style buckle was used on each of the Subject Car Seats after the last date of production listed.

**3. Total number of items of equipment:**

The total number of Subject Car Seats affected by this report is 1,368,649.

**4. Approximate percentage of affected equipment:**

Over time, all of the Subject Buckles could become potentially difficult to unlatch. To date, however, approximately 0.13% (or 1.3 per 1000) of the Subject Car Seats have been reported to have Subject Buckles which, over time, have become difficult to unlatch or fixed in a latched position.

**5. Description of the condition:**

The Subject Buckle is an "off-the-shelf" harness crotch buckle, in that it was designed and manufactured in its entirety by AmSafe, an Evenflo supplier. It is not intended to be unlatched by children occupying the car seat, but intended to be unlatched by an adult caregiver. Hence, the force necessary to release the Subject Buckle is purposefully set at levels where a child would not be expected capable of unlatching it.

The Subject Buckle is a 5-point harness crotch buckle comprised of two metal tongues and a buckle housing with a central release button on its face. To unlatch the Subject Buckle, an adult caregiver depresses the top portion of the central release button to eject the buckle tongues from the buckle housing.

Evenflo and NHTSA have received complaints about the Subject Buckle becoming resistant to unlatching over time, due to exposure of the Subject Buckle to various contaminants (like food and drinks) that are present in everyday use of the Subject Car Seats by toddlers. This condition may make it difficult to remove a child from the vehicle, increasing the risk of injury in the event of an emergency situation where prompt exit of the vehicle by the occupants is necessary.

**6. Chronological summary of events leading to this determination:**

In August 2011, Evenflo began use of the Subject Buckles on the first of the Subject Car Seats to use this component, the Maestro harnessed booster. Consistent with the affected dates of manufacture listed in Paragraph 2 above, Evenflo implemented use of the Subject Buckles over the population of Subject Car Seats indicated in Paragraph 2.

During the period Evenflo was using the Subject Buckle, the company received numerous complaints that the Subject Buckles were becoming difficult to unlatch, and, at times, even becoming fixed in a latched position. Through engineering inspections of returned units, Evenflo determined that when the Subject Buckles were contaminated with materials such as food or dried liquids, they could become resistant to unlatching over time, and, in some cases, could become fixed in a latched position.



Engineering inspections confirmed that cleaning the buckle would remedy these unlatching difficulties in most instances. This finding was consistent with feedback from consumers to whom Evenflo had recommended cleaning and for which the condition consequently was alleviated.

Also during the time when Evenflo was using the Subject Buckle, AmSafe provided an updated design aimed at making it easier to unlatch. Evenflo began using the updated design of the Subject Buckle on the Subject Car Seats as early as October 2012. This updated design improved customer satisfaction, but did not eliminate the difficulty in unlatching entirely. To enhance customer satisfaction with the Subject Buckles, Evenflo began including with all of the Subject Car Seats manufactured after June 5, 2013, a publication entitled, "Tips for Using this Restraint's Buckle," which outlined tips for easier latching and unlatching, as well as buckle cleaning instructions. This publication was also made available to consumers who contacted Evenflo's consumer services center after June 5, 2013, with concerns about the operation of the Subject Buckle. Further, when cleaning did not resolve the issue, Evenflo provided replacement buckles to consumers, regardless of whether the consumer's Subject Car Seat was still under warranty.

In October 2012, NHTSA opened an investigation into various car seats manufactured by Graco Children's Products, Inc. ("Graco"), based on 25 consumer complaints to NHTSA that consumers were having difficulty unlatching the crotch buckle of numerous Graco model car seats. Although Graco's investigation involved several buckle designs, one of the buckles it used was apparently the same AmSafe buckle as the Subject Buckle used by Evenflo. Within the following five months, NHTSA had received a total of 80 complaints regarding Graco's crotch buckles, and the investigation of Graco's buckles was expanded. Following NHTSA's issuance of a January 2014 letter requesting that Graco conduct a recall, "as a stuck or sticking buckle prevents or impedes the removal of a child from a car seat in any emergency situation," Graco announced a recall of numerous car seats models, some of which utilized the same AmSafe buckle as the Subject Buckle of this report.

Days before Graco's February 7, 2014, recall announcement, NHTSA opened a preliminary investigation of Evenflo's use of the Subject Buckle, PE14-003, based on NHTSA's receipt of 18 consumer complaints over a two-year period about several Evenflo car seat models. In connection with that preliminary investigation, NHTSA issued an Information Request to the company, which is being answered under separate cover today, and informally solicited additional information which Evenflo has already provided to the agency.

As of today's date, Evenflo has assembled the data necessary to respond to NHTSA's PE14-003 information requests. Evenflo has analyzed that data regarding the Subject Buckle through a lens that includes: (1) the recent Graco recall involving an AmSafe buckle believed to be identical to the Subject Buckle; (2) NHTSA's recent publication of its assessment of the potential risks associated with Graco's AmSafe buckle in an emergency situation; and (3) the physical orientation of the Subject Buckle in the Subject Car Seats and the use conditions of the Subject Car Seats, both of which contribute to enhanced potential for contamination to interfere with the Subject Buckle's functionality over time. Based on these considerations, Evenflo has determined that a safety recall is warranted with regard to the Subject Car Seats.

## **7. *Description of the proposed remedy:***

Evenflo is no longer using the Subject Buckles in the production of any of the Subject Car Seats. Following the last production dates listed in Paragraph 2, Evenflo is using newly-designed buckles on

the Subject Car Seats. Evenflo intends to provide owners of the Subject Car Seats with a remedy kit, including a replacement buckle and instructions for easy consumer removal of the Subject Buckle and installation of the newly-designed replacement buckle.

**8. Program for remedy campaign:**

- Following NHTSA'S approval of Evenflo's Part 577 consumer notification, Evenflo will begin mailing the notice to all registered owners of the Subject Car Seats. The notification will explain the recall and provide instructions regarding how to obtain the remedy kit described above in Paragraph 7. Evenflo's proposed consumer notification, conforming to NHTSA requirements, is attached as **Exhibit A**.
- Evenflo has created a dedicated recall website, [www.buckle.evenflo.com](http://www.buckle.evenflo.com), where information regarding how to obtain a remedy kit, as well as instructions and videos on how to install the remedy kit of the replacement buckle, will be made available. Links to other helpful information, such as frequently asked questions and answers, translations of key recall documents and cleaning instructions for the Subject Buckle (to be used until a consumer receives a remedy kit) will be included. In addition, Evenflo has created a dedicated toll-free number, 1-800-490-7591, to receive consumer telephone calls.
- In connection with the announcement of the recall, Evenflo will issue a customer notice to all retailers with impacted inventory. A copy of the customer notice Evenflo will be sending its retail customers is attached as **Exhibit B**. Evenflo will also provide its retail customers with a retail poster, so that they may display it in their store locations to provide additional guidance to consumers. A copy of the retail poster is attached as **Exhibit C**.

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NHTSA's prompt consideration of this report would be appreciated. Evenflo has acted swiftly once it decided to undertake a voluntary safety recall with respect to the Subject Buckle in convertible child restraints and harnessed boosters. Evenflo would like to announce this recall to its consumers on April 4, 2014.

## EXHIBIT A

This page has been intentionally redacted because it contains preliminary information.



## EXHIBIT B



Dear Valued Evenflo Retailer:

Please be advised that Evenflo Company, Inc. ("Evenflo") has decided, as of April 4, 2014, to recall select 2011-2014 toddler convertible car seats and harness booster seats, identified below by name, SKU prefix and date of manufacture. In many instances, these products have already been sold through your inventory. Please also note that none of these products currently being shipped or manufactured for you are subject to this recall.

Model Names	SKU Prefix	Affected Dates of Manufacture
Momentum 65, Momentum 65 LX and Momentum 65 DLX	385	3/4/2013 through 8/26/2013
Chase, Chase LX and Chase Select	306	6/12/2012 through 10/3/2013
Chase LX and Chase DLX	329	8/23/2011 through 3/3/2014
Maestro and Maestro Performance	310	8/22/2011 through 10/17/2013
Symphony 65, Symphony LX and Symphony DLX	345	10/2/2012 through 8/26/2013
Symphony 65, Symphony 65 E3, Symphony DLX and Snugli All-in-One	346	10/2/2012 through 8/26/2013
Titan 65 and SureRide DLX	371	6/20/2012 through 10/17/2013
Secure Kid LX, Secure Kid DLX, Secure Kid 100, Secure Kid 300, Secure Kid 400 and Snugli Booster	308	12/13/2011 through 3/3/2014

The date of manufacture is located on the white 4x3 bar code shipping label on the car seat or booster carton. The date is in year/day/month format. In the label below, 2014/02/24 means a manufacturing date of February 2, 2014; therefore, this seat would not be subject to recall, even though it is a model with a 346 prefix.



These select models of car seats and boosters use a harness crotch buckle which may become resistant to unlatching over time, due to exposure to various contaminants, like food and drinks. This condition may make it difficult to remove a child from the restraint, increasing the risk of injury in the event of an emergency situation where prompt exit of the vehicle is necessary. There is no such risk if the buckle is functioning normally. These car seats and boosters meet all requirements for crashworthiness under FMVSS 213.

Evenflo is providing at no charge to the consumers who have own affected car seats and boosters a remedy kit that includes a replacement buckle and instructions for installation. The remedy kit is available by contacting Evenflo at [www.buckle.evenflo.com](http://www.buckle.evenflo.com) or 1-800-490-7591. We have asked consumers not to return these car seats and boosters to retailers.

Please note that it is a violation of federal law for a retailer to sell or deliver any affected product covered by this recall unless the product is remedied. Please contact your Evenflo sales representative with questions about this recall. In addition, we are enclosing a recall poster that we would like you to post in a prominent location for the next 120 days.

We anticipate that with our support efforts we can minimize the disruption this recall may cause and move forward with our growing partnership.

## EXHIBIT C

# Safety Recall



## Evenflo® Convertible Car Seats and Harnessed Boosters

Model Names	Model Number Prefix	Affected Dates of Manufacture
Momentum 65, Momentum 65 LX and Momentum 65 DLX	385	3/4/2013 through 8/26/2013
Chase, Chase LX and Chase Select	306	6/12/2012 through 10/3/2013
Chase LX and Chase DLX	329	8/23/2011 through 3/3/2014
Maestro and Maestro Performance	310	8/22/2011 through 10/17/2013
Symphony 65, Symphony LX and Symphony DLX	345	10/2/2012 through 8/26/2013
Symphony 65, Symphony 65 E3, Symphony DLX and Snugli All-in-One	346	10/2/2012 through 8/26/2013
Titan 65 and SureRide DLX	371	6/20/2012 through 10/17/2013
Secure Kid LX, Secure Kid DLX, Secure Kid 100, Secure Kid 300, Secure Kid 400 and Snugli Booster	308	12/13/2011 through 3/3/2014

These select models use a harness crotch buckle which may become resistant to unlatching over time, due to exposure to various contaminants (like food and drinks) that are present in everyday use. This condition may make it difficult to remove a child from the car seat or booster, increasing the risk of injury in the event of an emergency situation where prompt exit of the vehicle by the occupants is necessary. There is no such risk if the buckle is functioning normally. These car seats and boosters meet all requirements for crashworthiness under the federal FMVSS 213 safety standard and can continue to be used to transport your child safely, if you are not experiencing difficulty unlatching the buckle.

Consumers who own car seats or boosters subject to this recall should visit the recall website or call Evenflo's toll-free number for a free remedy kit of a replacement buckle. Recalled units should not be returned to the retailer.

[www.buckle.evenflo.com](http://www.buckle.evenflo.com)

**1-800-490-7591**  
(8am – 5pm EST)

This recall is being done in cooperation with the National Highway Traffic Safety Administration.

Please post until August 4, 2014